

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Joseph M. Tinney	:	Chapter 13
	:	Case No. 22-12545-AMC
Debtor(s)	:	

RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY
FILED BY HATBORO FEDERAL SAVINGS BANK

Debtor, Joseph M. Tinney, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Hatboro Federal Savings Bank, hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied.
6. Denied as relevant.
7. Denied as relevant.
8. Denied as relevant.
9. Denied as relevant.
10. Denied.
11. Admitted.
12. Denied.
13. Not applicable.
14. Denied.
15. Admitted.

16. Admitted.
17. Denied. Debtor remitted October's payment in two separate money orders.
18. Denied as relevant.
19. Denied.

WHEREFORE, Debtor, by and through the undersigned counsel, respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

/s/ Brad J. Sadek, Esq.

Dated: October 28, 2022

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1500 JFK Boulevard Suite #220
Philadelphia, PA 19102
(215) 545-0008

CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

Kenneth E. West, Esq.
Standing Chapter 13 Trustee
Electronic Notice

John J. McAneney, Esq.
Attorney for Movant *Hatboro Federal Savings*
Electronic Notice to jmcaneney@timoneyknox.com

Dated: October 28, 2022

/s/Brad J. Sadek, Esq_____
Brad J. Sadek, Esq.
Attorney for Debtor